

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACK E. GRUBB, III,  
[DOB: 07/15/1981]

Defendant.

Case No. \_\_\_\_\_

**COUNT ONE:  
Receipt of Child Pornography  
Over the Internet**

18 U.S.C. § 2252(a)(2)

NLT: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life  
Class C Felony

**COUNT TWO:  
Attempted Distribution of Child  
Pornography Over the Internet**

18 U.S.C. § 2252(a)(2)

NLT: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life  
Class C Felony

**COUNT THREE:  
Possession of Child Pornography**

18 U.S.C. § 2252(a)(4)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life  
Class C Felony

**Forfeiture Allegation**

\$100 Mandatory Special Assessment  
(Each Count)

## I N D I C T M E N T

### **THE GRAND JURY CHARGES THAT:**

#### **COUNT ONE**

On or about October 27, 2013 the date being approximate, in the Western District of Missouri and elsewhere, **JACK E. GRUBB, III**, defendant, using any means or facility of interstate or foreign commerce, knowingly received a visual depiction, separate and apart from the visual depictions relied upon in Counts Two and Three, that had been shipped and transported in or affecting interstate and foreign commerce by any means including by computer, and the visual depiction contained material which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

#### **COUNT TWO**

On or about November 7, 2013, the date being approximate, in the Western District of Missouri and elsewhere, **JACK E. GRUBB, III**, defendant, using any means or facility of interstate or foreign commerce, knowingly attempted to distribute a visual depiction, separate and apart from the visual depictions relied upon in Counts One and Three, that had been shipped and transported in or affecting interstate and foreign commerce by any means including by computer, and the visual depiction contained material which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

**COUNT THREE**

On or about January 23, 2014, in the Western District of Missouri, **JACK E. GRUBB, III**, defendant, knowingly possessed one (1) or more films, videotapes, and other matter which contained visual depictions, separate and apart from the visual depictions relied upon in Counts One and Two, that had been shipped and transported in interstate and foreign commerce by any means including by computer, and which were produced using materials which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depictions involved the use of minors engaging in sexually explicit conduct, and were visual depictions of such conduct, in violation of Title 18, United States Code, Section 2252(a)(4).

**FORFEITURE ALLEGATION**

The allegations contained in Counts One through Four are realleged and are incorporated by reference herein for the purpose of alleging forfeiture of: any visual depiction described in Title 18, United States Code, Section 2252, or any film, videotape, or other matter which contains any such visual depiction, which was transported, mailed, shipped, or received in violation of these sections; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses; including, but not limited to the following:

1. One Hitachi HTS541680J9SA00, 80 GB SATA laptop hard drive with serial number SGGM2UGE; and
2. One Western Digital WD1000 WD Caviar 100GB IDE hard drive with serial number WMA8C8065468.

All in violation of Title 18, United States Code, Section 2253.

A TRUE BILL.

/s/ Helen A. Chaffin  
FOREPERSON OF THE GRAND JURY

/s/ Catherine A. Connolly

Catherine A. Connolly #39018  
Assistant United States Attorney

Date: 9/10/15  
Kansas City, Missouri